

Hearing Date and Time: To be determined.
Response Deadline: December 2, 2019
Reply Deadline: December 17, 2019

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PERFORADORA ORO NEGRO, S. DE R.L. DE C.V.,
et al.

Debtors in a Foreign Proceeding.

Chapter 15

Case No. 18-11094 (SCC) (Jointly
Administered)

FERNANDO PEREZ-CORREA IN HIS CAPACITY
AS FOREIGN REPRESENTATIVE OF
PERFORADORA ORO NEGRO, S. DE R.L. DE C.V.;
JOSE ANTONIO CAÑEDO-WHITE; CARLOS
WILLIAMSON-NASI; GONZALO GILWHITE;
AND MIGUEL ANGEL VILLEGAS-VARGAS

Plaintiff,

-against-

ASIA RESEARCH AND CAPITAL MANAGEMENT
LTD.; GHL INVESTMENTS (EUROPE) LTD.; ORO
NEGRO PRIMUS PTE., LTD.; ORO NEGRO
LAURUS PTE., LTD.; ORO NEGRO FORTIUS PTE.,
LTD.; ORO NEGRO DECUS PTE., LTD.; ORO
NEGRO IMPETUS PTE., LTD.; SHIP FINANCE
INTERNATIONAL LTD.; and DOES 1-100

Defendants.

Adv. Pro. No. 19-01360(SCC)

NOTICE AND MOTION TO DISMISS COMPLAINT

PLEASE TAKE NOTICE THAT, upon the accompanying Defendants' Memorandum of Law in Support of Their Motion to Dismiss, the Declaration of William A. Clareman and the exhibits thereto, and all pleadings and proceedings heretofore had before this Court, Defendants Asia Research and Capital Management Ltd., GHL Investments (Europe) Ltd., and Ship Finance International Ltd. (the "Bondholder Defendants"), by and through their undersigned counsel, will move before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, in Courtroom 623 of the United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York, New York, 10004, at a date and time to be determined by the Court, pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6), for the entry of an Order (i) dismissing the Complaint in its entirety, and (ii) granting such other and further relief as this Court may deem just and proper. (Hereinafter, the "Motion.")

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must be in writing, must conform to the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and the Local Rules of the Bankruptcy Court for the Southern District of New York, must set forth the name of the objecting party, the basis for the objection and the specific grounds therefore, and must be filed with the Bankruptcy Court, by no later than **December 2, 2019**, and any objection must further be served upon (i) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, New York 10019, Attn: Andrew N. Rosenberg, Esq., Aidan Synnott, Esq., William A. Clareman, Esq., and Claudia Tobler, Esq., attorneys for Bondholder Defendants; (ii) Quinn Emanuel Urquhart & Sullivan, LLP, 1300 I Street NW, Washington, D.C., Attn: Juan P. Morillo, Esq., attorney for Plaintiffs; and (iii) those parties who have filed a notice of appearance in the above referenced adversary proceeding.

PLEASE TAKE FURTHER NOTICE, that a hearing will be held with respect to
the Motion on a date and at a time to be determined by the Court.

Dated: October 31, 2019
New York, New York

PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP

/s/ William A. Clareman

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William A. Clareman
Claudia Tobler
Christopher Hopkins
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